

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

AMRO ALI, M.D.,

x

Civil Action No. 19-CV-8324-DLC-DCF

Plaintiff,

**DECLARATION OF  
PAUL F. MILLUS IN SUPPORT  
OF DEFENDANTS' MOTION  
FOR SUMMARY JUDGMENT**

## Defendants.

x

PAUL F. MILLUS declares the following pursuant to 28 U.S.C. § 1746:

1. I am a Member of Meyer, Suozzi, English & Klein, P.C., attorneys for Defendants Westchester Medical Center and New York Medical College (Together, "Defendants") in the above-captioned matter, and, as such, I am fully familiar with the facts and circumstances set forth herein.

2. I submit this Declaration in support of Defendants' motion for summary judgment pursuant to Fed. R. Civ. P. 56.

3. Exhibit A is a true and correct copy of the complaint filed by Plaintiff Amro Ali, M.D. (“Plaintiff”) on September 6, 2019.

4. Exhibit B is a true and correct copy of Defendants' answer to Plaintiff's complaint

5 Exhibit C is a true and correct copy of Plaintiff's curriculum vitae

6. Exhibit D is a true and correct copy of the transcript of Plaintiff's deposition taken on September 29, 2020.

7. Exhibit E is a true and correct copy of the transcript of Dr. Sansar Sharma's deposition taken on September 21, 2020.

8. Exhibit F is a true and correct copy of the transcript of Dr. Fredrick Bierman's deposition taken on September 23, 2020.

9. Exhibit G is a true and correct copy of the transcript of Dr. Kelly Hutcheson's deposition taken on September 25, 2020.

10. Exhibit H is a true and correct copy of the transcript of Dr. Thaddeus Wandel's deposition taken on September 30, 2020.

11. Exhibit I is a true and correct copy of Plaintiff's "Recommendation for NYMC Faculty Appointment/Promotion," dated February 10, 2016.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Garden City, New York  
October 30, 2020

*s/ Paul F. Millus*  
PAUL F. MILLUS